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and J.P. Morgan Securities Ltd.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JPMORGAN CHASE & CO., JPMORGAN
CHASE BANK, N.A., J.P. MORGAN
SECURITIES LLC, and J.P. MORGAN
SECURITIES LTD.,

Defendants.

11 Civ. 913 (CM)

JPMORGAN'S MOTION TO DISMISS THE TRUSTEE'S COMPLAINT

TO THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK:

PLEASE TAKE NOTICE that, upon the accompanying Opening Brief in Support of JPMorgan's Motion to Dismiss the Trustee's Complaint; the Declaration of Emil A. Kleinhaus and exhibits thereto; and all the papers filed and proceedings had herein, defendants JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., J.P. Morgan Securities LLC and J.P. Morgan Securities Ltd. respectfully hereby move this Court for an order dismissing with prejudice causes of action 1 through 8 and 17 through 21 of the Complaint filed in this proceeding.

PLEASE TAKE FURTHER NOTICE that, pursuant to this Court's direction at the hearing held on May 4, 2011, any answering papers in response to this motion are due to be filed on or before July 1, 2011, any reply brief is due to be filed on or before July 15, 2011, and oral argument is scheduled for July 28, 2011 at 2:00 p.m.

Dated: New York, New York
June 3, 2011

Respectfully submitted,

Of counsel:

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